

JAN 28 2019



January 18, 2019

VIA CERTIFIED MAIL

Brett Hurst
Hanson Aggregates
9229 Harris Plant Rd
San Diego CA 92145

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Corporation Service Company
Agent for Service of Process
Hanson Aggregates LLC
2710 Gateway Oaks Drive, Suite 150N
Sacramento CA 95833

Corporation Service Company
Agent for Service of Process
Hanson Aggregates Pacific Southwest, Inc
2710 Gateway Oaks Drive, Suite 150N
Sacramento CA 95833

**Re: Clean Water Act Notice of Intent to Sue/60-Day Notice Letter
Hanson Aggregates' Violations of General Industrial Permit**

Dear Mr. Hurst:

Please accept this letter on behalf of the Coastal Environmental Rights Foundation (CERF) and San Diego Coastkeeper (Coastkeeper) regarding Hanson Aggregate LLC's (Hanson Aggregates) violations of the State Water Resources Control Board Water Quality Order No. 97-03-DWQ, Natural Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001, and Waste Discharge Requirements for Discharges of Storm Water Associated With Industrial Activities Excluding Construction Activities (General Industrial Permit) and the San Diego Regional Water Quality Control Board (Regional Board)'s Order No. R9-2014-0041, Conditional Waiver of Waste Discharge Requirements for Low Threat Discharges in the San Diego Region (Conditional Waiver).¹

This letter constitutes CERF and Coastkeeper's notice of intent to sue for violations of the Clean Water Act, General Industrial Permit and Conditional Waiver for the Hanson Aggregates Miramar facility located at 9229 Harris Plant Rd San Diego CA 92145 (Miramar Facility or Facility), as set forth in more detail below.

¹ On April 1, 2014, the State Water Resources Control Board adopted Order No. 2014-0057-DWQ, which amends the Industrial General Permit ("New Industrial Permit"). These amendments became effective on July 1, 2015. All references to the General Industrial Permit are to the Permit as it existed at the time of the violations noted herein.

Section 505(b) of the Clean Water Act requires that sixty (60) days prior to the initiation of a citizen's civil lawsuit in Federal District Court under Section 505(a) of the Act, a citizen must give notice of the violations and the intent to sue to the violator, the Administrator of the U.S. Environmental Protection Agency, the Regional Administrator of the U.S. Environmental Protection Agency for the region in which the violations have occurred, the U.S. Attorney General, and the Chief Administrative Officer for the State in which the violations have occurred (33 U.S.C. § 1365(b)(1)(A)). This letter provides notice of Hanson Aggregates' Clean Water Act violations and CERF and Coastkeeper's intent to sue.

I. Citizen Groups

CERF is a non-profit public benefit corporation organized under the laws of the State of California with its main office in Encinitas, CA. CERF is dedicated to the preservation, protection, and defense of the environment, the wildlife, and the natural resources of the California Coast. CERF's mailing address is 1140 S. Coast Highway 101, Encinitas, CA 92024.

Coastkeeper is a nonprofit organization committed to protecting and restoring the San Diego region's water quality and supply. A member of the international Waterkeeper Alliance, Coastkeeper's main purpose is to preserve, enhance, and protect San Diego's waterways, marine sanctuaries, coastal estuaries, wetlands, and bays from illegal dumping, hazardous spills, toxic discharges, and habitat degradation. Coastkeeper implements this mission through outreach, education, activism, participation in governmental hearings, and prosecuting litigation to ensure that San Diego's beaches, bays, coastal waters and tributary streams and rivers meet all substantive water quality standards guaranteed by Federal, State, and local statutes and regulations. Coastkeeper's office is located at 2825 Dewey Road, Suite 207 in San Diego, California 92106.

Members of CERF and Coastkeeper use and enjoy the waters into which pollutants from Hanson Aggregates' ongoing illegal activities are discharged, namely San Clemente Canyon Creek, Rose Creek, Mission Bay, and eventually the Pacific Ocean (Receiving Waters). The public and members of CERF and Coastkeeper use these Receiving Waters to fish, boat, kayak, surf, swim, scuba dive, birdwatch, view wildlife, and to engage in scientific studies. The discharge of pollutants by the Miramar Facility affects and impairs each of these uses. Thus, the interests of CERF and Coastkeeper's members have been, are being, and will continue to be adversely affected by Hanson Aggregates Owners and/or Operators' failure to comply with the Clean Water Act and the General Industrial Permit.

II. Storm Water Pollution and the General Industrial Permit

A. Duty to Comply

Under the Clean Water Act, the discharge of any pollutant to a water of the United States is unlawful except in compliance with certain provisions of the Clean Water Act. (See 33 U.S.C. § 1311 (a)). In California, any person who discharges storm water associated with industrial activity must comply with the terms of the General Industrial Permit in order to lawfully discharge.

The Hanson Aggregates Owners and/or Operators conduct recycle base operations, maintenance operations, a concrete plant, an inactive sand plant, and truck and equipment fueling operations. (November 2017 SWPPP, Section C.2.). Until 2017, Facility Owners and/or Operators also conducted

compost and mineral blending operations (A-1 Soils). (June 2015 SWPPP, Section C.2., December 2016 SWPPP, Section C., F.). The Facility SIC Codes are 1442, Construction Sand and Gravel and 3273, Ready-Mixed Concrete.

Hanson Aggregates enrolled as a discharger subject to the General Industrial Permit on April 22, 1992 for its Miramar Facility located at 9229 Harris Plant Rd, San Diego, CA 92145. Hanson Aggregates submitted its most recent NOI for coverage under the New Industrial Permit on February 2, 2017, WDID Number 9 37I006224. Hanson also obtained coverage under the Conditional Waiver, Waiver No. 9 on June 5, 2015.

Pursuant to Section C(1) of the General Industrial Permit, a facility operator must comply with all conditions of the General Industrial Permit. (See New Industrial Permit, §I.A.8. [dischargers must “comply with all requirements, provisions, limitations, and prohibitions in this General Permit.”]). Failure to comply with the General Industrial Permit is a Clean Water Act violation. (General Industrial Permit, § C.1; New Industrial Permit §XXI.A.). Any non-compliance further exposes an owner/operator to an (a) enforcement action; (b) General Industrial Permit termination, revocation and re-issuance, or modification; or (c) denial of a General Industrial Permit renewal application. As an enrollee, Hanson Aggregates has a duty to comply with the General Industrial Permit and New Industrial Permit and is subject to all of the provisions therein.

Likewise, any Discharger proposing to discharge slurries to land, or wastes to land at composting facilities, must comply with the general waiver conditions in order to meet the provisions contained in Division 7 of the Water Code, section 13269. (Conditional Waiver, Waiver No. 9, p. 43).

B. Failure to Monitor and Report

The Hanson Aggregates Owners and/or Operators have failed to report all monitoring data as required under the Industrial Permit and New Industrial Permit. Sections B(5) and (7) of the Industrial Permit requires dischargers to visually observe and collect samples of storm water discharged from all locations where storm water is discharged. Facility operators, including the Hanson Aggregates Owners and/or Operators, were required to collect samples from at least two qualifying storm events each wet season, including one set of samples during the first storm event of the wet season. Required samples were to be collected by Facility operators from all discharge points and during the first hour of the storm water discharge from the Facility. Hanson Aggregates did not sample any storm events from the 2011-2012 reporting period until the New Industrial Permit went into effect.

Under the New Industrial Permit, Hanson Aggregates is required to sample all discharge points during two qualifying storm events (QSEs) in the first half of the reporting period, and two during the latter half. (New Industrial Permit, §XI.B.2). Compliance Group participants are required to sample one QSE during the first half of the reporting period and one during the latter half. (New Industrial Permit, §XI.B.3). All monitoring data must be uploaded to SMARTS within 30 days of obtaining all results for each sampling event. (New Industrial Permit, §XI.B.11.a.).

Information available to CERF and Coastkeeper, including the Facility SWPPP and SWPPP map, indicates that there are at least three storm water discharge locations at the Facility. The Hanson Aggregates Owners and/or Operators have failed to consistently sample and upload data to SMARTs for all three discharge points for the required number of QSEs. (New Industrial Permit, §XI.B.4.). For

example, during the 2016-2017 Reporting Year, Facility Owners and/or Operators never sampled DP-1, only sampled DP-2 during one QSE, and only sampled DP-3 during one QSE. Also, Facility Owners and/or Operators failed to upload to SMARTS a lead exceedance of 26 mg/L measured at DP-2 on January 7, 2016.

The Hanson Aggregates Owners and/or Operators had numerous opportunities to sample but failed to do so. (See Exhibit A). Every day the Hanson Aggregates Owners and/or Operators failed to adequately monitor the Facility is a separate and distinct violation of the Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). These violations are ongoing, and the Hanson Aggregates Owners and/or Operators will continue to be in violation every day they fail to adequately monitor the Facility. The Hanson Aggregates Owners and/or Operators are thus subject to penalties in accordance with the Industrial Permit – punishable by a minimum of \$37,500 per day of violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

C. The Miramar Facility Discharges Contaminated Storm Water in Violation of the General Industrial Permit

The Hanson Aggregates Owners and/or Operators' monitoring reports indicate consistent exceedances and violations of the General Industrial Permit. Discharge Prohibition A(2) of the General Industrial Permit and New Industrial Permit Sections III.C-D prohibit storm water discharges and authorized non-storm water discharges which cause or threaten to cause pollution, contamination, or nuisance.

Discharge Prohibition III.D. of the 2015 Permit prohibits discharges that violate any discharge prohibitions contained in applicable Regional Water Board Water Quality Control Plans (Basin Plans), or statewide water quality control plans and policies. See 2015 Permit, Discharge Prohibition III.D.

The Water Quality Control Plan for the San Diego Basin (San Diego Basin Plan) designates beneficial uses for water bodies in the San Diego region and establishes water quality objectives and implementation plans to protect those beneficial uses. The San Diego Basin Plan further establishes within it Waste Discharge Prohibitions. Waste Discharge Prohibition number 5 of the San Diego Basin Plan states, "the discharge of waste to inland surface waters, except in cases where the quality of the discharge complies with the applicable receiving water quality objectives, is prohibited. Allowances for dilution may be made at the discretion of the Regional Board" "Waste" is defined as, "waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation," which includes discharges of pollutants in storm water. Accordingly, where the "quality of the discharge" does not meet water quality objectives, the discharge, absent an express "allowance for dilution" by the San Diego Regional Water Quality Control Board is prohibited by Discharge Prohibition III.D. of the 2015 Permit.

Information available to Coastkeeper and CERF, including their review of publicly available information and observations, indicates that no express allowance for dilution has been granted by the Regional Water Board applicable to these Receiving Waters or X Facility's discharges. As such, and consistent with Coastkeeper and CERF's review of available information and direct observations, the analytical results of storm water sampling at the Facility demonstrate that the Hanson Aggregates Owners and/or Operators have failed and continues to violate Discharge Prohibition III.D. of the 2015 Permit by

discharging storm water containing pollution in excess of water quality objectives listed in the San Diego Basin Plan. Specifically, Facility discharges have exceeded Basin Plan water quality objectives for numerous pollutants.

Effluent Limitation B(3) of the General Industrial Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges through implementation of BMPs that achieve Best Available Technology Economically Achievable (“BAT”) for toxic and non-conventional pollutants and Best Conventional Pollutant Control Technology (“BCT”) for conventional pollutants. The New Permit includes the same effluent limitation. *See* 2015 Permit, Effluent Limitation V(A).

Information available to CERF and Coastkeeper, including via review of publicly available information and observations, indicates BMPs that achieve BAT/BCT have not been developed and/or implemented at the Facility. Consistent with CERF and Coastkeeper’s review of available information and direct observations, the analytical results of storm water sampling at the Facility demonstrate that the Hanson Aggregates Owners and/or Operators have failed and continue to fail to develop and/or implement BAT/BCT and achieve compliance with BAT/BCT standards, as required. Specifically, Facility discharges have exceeded EPA Benchmarks for numerous pollutants. EPA Benchmarks are relevant and objective standards for evaluating whether a permittee’s BMPs achieve compliance with BAT/BCT standards as required by Effluent Limitation B(3) of the 1997 Permit and Effluent Limitation V(A) of the 2015 Permit.¹

Receiving Water Limitation C(1) of the Storm Water Permit prohibits storm water discharges to surface or groundwater that adversely impact human health or the environment. Receiving Water Limitation C(2) prohibits storm water discharges and authorized non-storm water discharges which cause or contribute to an exceedance of any water quality standards or applicable Basin Plan water quality standards. (See New Industrial Permit Receiving Water Limitations VI.A-C). In addition, Receiving Water Limitation VI.C. of the New Industrial Permit prohibits discharges that contain pollutants in quantities that threaten to cause pollution or a public nuisance.

The California Toxics Rule (“CTR”), 40 C.F.R. 131.38, is an applicable water quality standard. (*Baykeeper v. Kramer Metals, Inc.* (C.D.Cal. 2009) 619 F.Supp.2d 914, 926). “In sum, the CTR is a water quality standard in the General Permit, Receiving Water Limitation C(2). A permittee violates Receiving Water Limitation C(2) when it ‘causes or contributes to an exceedance of’ such a standard, including the CTR.” (*Id.* at 927).

If a discharger violates Water Quality Standards, the General Industrial Permit and the Clean Water Act require that the discharger implement more stringent controls necessary to meet such Water Quality Standards.(General Industrial Permit, Fact Sheet p. viii; 33 U.S.C. § 1311(b)(1)(C); New Industrial Permit, §XX.B.). The Hanson Aggregates Owners and/or Operators have failed to comply with this requirement, routinely violating Water Quality Standards without implementing BMPs to achieve

¹ *See United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) Authorization to Discharge Under the National Pollutant Discharge Elimination System*, as modified effective February 26, 2009, Fact Sheet at 106; *see also*, 65 Federal Register 64839 (2000).

BAT/BCT or revising the Facility's SWPPP pursuant to General Industrial Permit section (C)(3) and New Industrial Permit Section X.B.1.

As demonstrated by sample data submitted by Hanson Aggregates, from enrollment through the present, the Hanson Aggregates Owners and/or Operators have discharged and continue to discharge storm water containing pollutants at levels in violation of water quality prohibitions and limitations during every significant rain event. The Miramar Facility's sampling data reflects numerous discharge violations (see below). Hanson Aggregates' own sampling data is not subject to impeachment. (*Baykeeper, supra*, 619 F.Supp. 2d at 927, citing *Sierra Club v. Union Oil Co. of Cal.*, (9th Cir. 1987) 813 F.2d 1480, 1492 ["when a permittee's reports indicate that the permittee has exceeded permit limitations, the permittee may not impeach its own reports by showing sampling error"]).

This data further demonstrates the Miramar Facility continuously discharges contaminated storm water during rain events which have not been sampled.

No.	Date	Sample Location/ Latitude	Sample Location/ Longitude	Parameter	Units	Result	Benchmark/ WQO	Benchmark/ NAL
1	1/7/2016	DP2		Iron, Total	mg/L	3.51	.3 ¹	1.0
2	1/7/2016	DP2		Nitrite Plus Nitrate (as N)	mg/L	10.54	.68 ³	.68
3	1/7/2016	DP2		Total Suspended Solids (TSS)	mg/L	193	100 ³	100
4	1/7/2016	DP2		Lead	mg/L	26	.065 ²	.262
5	5/4/2016	DP3		Iron, Total	mg/L	0.998	.3 ¹	1.0
6	5/4/2016	DP3		Nitrite Plus Nitrate (as N)	mg/L	8.3	.68 ³	.68
7	12/16/2016	DP2		Iron, Total	mg/L	22	.3 ¹	1.0
8	12/16/2016	DP1		Iron, Total	mg/L	4.65	.3 ¹	1.0
9	12/16/2016	DP2		Phosphorus, Total (as P)	mg/L	0.277	.1 ¹	2.0
10	12/16/2016	DP2		Total Suspended Solids (TSS)	mg/L	529	100 ³	100
11	12/16/2016	DP2		Zinc, Dissolved	mg/L	0.243	.12 ²	.26
12	1/27/2017	DP3		Iron, Total	mg/L	3.77	.3 ¹	1.0
13	1/27/2017	DP3		Nitrite Plus Nitrate (as N)	mg/L	2.4	.68 ³	.68
14	1/9/2018	DP3		Iron, Total	mg/L	25.7	.3 ¹	1.0
15	1/9/2018	DP2		Iron, Total	mg/L	25.6	.3 ¹	1.0
16	1/9/2018	DP1		Iron, Total	mg/L	2.87	.3 ¹	1.0
17	1/9/2018	DP3		Total Suspended Solids (TSS)	mg/L	484	100 ³	100
18	1/9/2018	DP2		Total Suspended Solids (TSS)	mg/L	636	100 ³	100

19	1/9/2018	32.86057	-117.1262	pH	SU	8.85	Not < 6.5 or > 8.5	Not < 6.0 or > 9.0
20	1/9/2018	32.86057	-117.1262	pH	SU	8.95	Not < 6.5 or > 8.5	Not < 6.0 or > 9.0
21	2/27/2018	DP1		Iron, Total	mg/L	3.01	.3 ¹	1.0
22	2/27/2018	DP2		Iron, Total	mg/L	7.97	.3 ¹	1.0
23	2/27/2018	DP1		Nitrite Plus Nitrate (as N)	mg/L	1	.68 ³	.68
24	2/27/2018	DP2		Nitrite Plus Nitrate (as N)	mg/L	0.84	.68 ³	.68
25	2/27/2018	DP1		Phosphorus, Total (as P)	mg/L	0.12	.1 ¹	2.0
26	2/27/2018	DP2		Phosphorus, Total (as P)	mg/L	0.49	.1 ¹	2.0
27	2/27/2018	DP2		Total Suspended Solids (TSS)	mg/L	130	100 ³	100
28	2/27/2018	32.86057	-117.1262	pH	SU	9.7	Not < 6.5 or > 8.5	Not < 6.0 or > 9.0
29	11/29/2018	DP1		Iron, Total	mg/L	4.16	.3 ¹	1.0
30	11/29/2018	DP1		Phosphorus, Total (as P)	mg/L	0.34	.1 ¹	2.0
¹ Basin Plan Objective for San Clemente Canyon Creek								
² CTR based on 100 mg/L hardness								
³ MSGP EPA Benchmark Table 8.J-1, 8.E-1, or 8.C-1								

D. Inadequate Storm Water Pollution Prevention Plan

One of the main requirements for the General Industrial Permit is the Storm Water Pollution Prevention Plan (SWPPP). (General Industrial Permit §A; New Industrial Permit §X.). Hanson Aggregates has not developed an adequate SWPPP as required by the General Permit or New Industrial Permit, with many of the required elements noticeably absent from the Miramar Facility SWPPP. (New Industrial Permit, §X.A.1-10).

The three most recent Hanson Aggregates SWPPPs, dated December 2016, November 2017, and July 2018 fail to adequately assess the Facility's potential contribution of pollutants for which the Receiving Waters (San Clemente Creek, Rose Creek, and Mission Bay) are impaired. Rose Creek is on the 303(d) list as impaired for selenium and toxicity. The mouth of Rose Creek is on the 303(d) list as impaired for lead and for eutrophic conditions (nutrients). However, the Facility's 2016 and 2017 SWPPPs fail to acknowledge the Facility's potential contribution of lead and nutrients, both of which are often associated with concrete aggregates. Coastkeeper's own monitoring data, reported in CEDEN, shows Rose Creek is also impaired for bacteria. Furthermore, the Mission Bay Shoreline at Campland, near the mouth of Rose Creek, is on the 303(d) list as impaired for Enterococcus, Fecal Coliform, and Total Coliform. Despite these impairments and listings, each of the Facility's SWPPPs up to and including the December 2016 SWPPP (the last SWPPP which detailed composting activity at the Facility) and the July 2018 SWPPP fail to acknowledge the Facility's potential contribution bacteria, including Enterococcus, Fecal Coliform, and Total Coliform, which are often associated with composting activities.

The December 2016 SWPPP and July 2018 SWPPPs also fail to acknowledge the Facility's potential contribution of metals, including copper and manganese, which are often associated with compost from manure, litter, and large-scale feed lots.² In addition:

Compostable materials may contain nutrients, metals, salts, pathogens, and oxygen-reducing compounds that can degrade water quality if allowed to migrate into groundwater or surface water. The process of composting can allow contaminants to migrate with leachate or wastewater from these materials. (State Water Board Order WQ 2015-0121-DWQ, Finding 6).

Composting typically results in release of water from the feedstock material as biological decomposition occurs. The released water becomes leachate and if sufficient in volume will drain from the compost pile. Precipitation that falls on, or water that is applied to the compost piles may also result in liquid draining from the compost piles. The liquids may contain nutrients, metals, salts, pathogens, and/or oxygen reducing compounds. (*Id.*, Finding 18).

The latest SWPPP also fails to account for the numerous and repeated violations identified by Hanson Aggregates' monitoring data – ensuring these violations continue. The SWPPP is therefore inadequate. (See New Industrial Permit §I.E.37. [“Compliance with water quality standards may, in some cases, require Dischargers to implement controls that are more protective than controls implemented solely to comply with the technology-based requirements in this General Permit.”]).

Every day the Hanson Aggregates Owners and/or Operators operate the Facility without an adequate SWPPP, is a separate and distinct violation of the General Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). The Hanson Aggregates Owners and/or Operators have been in daily and continuous violation of the General Industrial Permit and New Industrial Permit since at least January 18, 2014. These violations are ongoing, and the Hanson Aggregates Owners and/or Operators will continue to be in violation every day they fail provide an adequate SWPPP for the Facility. Thus, the Hanson Aggregates Owners and/or Operators are liable for civil penalties of up to \$37,500 per day of violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

E. Conditional Waiver Non-Compliance

The Region 9 Conditional Waiver, Waiver No. 9 requires dischargers of slurries to enroll in and be in compliance with the General Industrial Permit. (Conditional Waiver No. 9, Section D.1., p. 44). Waiver No. 9 requires dischargers of slurries to “manage their wastes in a manner that protects beneficial uses, and prevent nuisance by implementing management measures (MMs) and best management practices (BMPs) (Conditional Waiver No. 9, Section G.3.). Dischargers must locate storage areas and/or sumps in such a way that “prevent[s] conditions of pollution or nuisance, of any surface water body or municipal water well (Conditional Waiver No. 9, Section B.2.c.).

² See <https://www.planetnatural.com/composting-101/compost-concerns-heavy-metals/>. Information available to CERF and Coastkeeper indicates that A-1 Soils was in the business of receiving green waste, and manure and stable bedding material from Del Mar Race track and other local horse stables during the period of its operation at the Facility.

Hanson Aggregates enrolled under the Conditional Waiver, Waiver No. 9 on June 5, 2015. According to the Facility SWPPP, the Hanson Aggregates Owners and/or Operators use a “reclaimer process[] to return concrete and interior truck wash water...Most paste produced by the reclaimer is processed by an Alar system to remove water. Reclaimer and Alar water is pumped to a water tank, and then reused for additional interior truck washing or to make concrete.” (SWPPP, Section F.7.). According to the Facility SWPPP map and information available to CERF and Coastkeeper, the alar and paste storage areas are exposed to rain and discharge contaminated storm water runoff that contributes to conditions of pollution or nuisance, in violation of the Conditional Waiver, Waiver No. 9. Also, some of the contaminated previously-stored water derived from slurries is used for interior and exterior truck washing activities near the truck wash pond, which drains to Discharge Point 1. (SWPPP, Section J.; SWPPP map). The Facility SWPPP acknowledges in Table L that interior and exterior truck washing and handling of return concrete is a potential pollution source of TSS, pH, and iron. As reflected above, past sampling from Discharge Point 1 reflects significantly elevated levels of iron, phosphorus, and nitrate + nitrite.

Rose Creek is impaired for numerous constituents, including iron and nutrients. Downstream Receiving Waters are impaired for additional constituents. Hanson Aggregates’ contribution to these impairments constitutes a violation of Waiver No. 9. Pollutants like TSS, lead, iron, zinc, phosphorus, nitrite + nitrate, and pH are present in Hanson Aggregates’ storm water discharge, adversely impacting the quality and beneficial uses of receiving waters. As reflected in the Facility’s SWPPP, the Facility’s drainage areas receive water that has previously passed through storage areas, ponds, and sumps. As a result of the inadequate design of these storage areas, ponds, and sumps, discharged water contributes to conditions of pollution or nuisance in Receiving Waters in violation of Conditional Waiver No. 9, Section B.2.c.

F. Inadequate Level 1 and Level 2 ERA Reports

The Facility entered Level 1 status for nitrite + nitrate in 2016. The Facility entered Level 1 status for TSS and iron in 2017. The Consolidated Level 1 ERA Report and the 12-14-2017 ERA Level 2 Report rely on increased housekeeping and sediment basin maintenance instead of advanced BMPs or other proven effective methods for reducing pollutants. Because the Facility’s Level 1 Technical Report was inadequate, the Facility is now in Level 2 status for nitrite + nitrate. Because the Facility’s Level 2 Technical Report was inadequate, the Facility has registered continued exceedances of nitrite + nitrate, iron, and TSS.

Every day the Hanson Aggregates Owners and/or Operators fail to submit an adequate Level 1 and Level 2 ERA Report is a separate and distinct violation of the Industrial Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311(a)). These violations are ongoing, and the Hanson Aggregates Owners and/or Operators will continue to be in violation every day they fail to revise and submit an appropriate Level 1 and Level 2 ERA Report.

G. Unauthorized Non-Storm Water Discharges

Except as authorized by Section IV of the New Industrial Permit, permittees are prohibited from discharging materials other than storm water (non-storm water discharges) either directly or indirectly to waters of the United States. (New Industrial Permit, §III.B.; IV.A-B).

Information available to CERF and Coastkeeper indicates that unauthorized non-storm water discharges occur at the Facility due to inadequate BMP development and/or implementation necessary to prevent these discharges. For example, unauthorized non-storm water discharges occur from the Facility's washing and cleaning and dust suppression activities. The Hanson Aggregates Owners and/or Operators conduct these activities without BMPs to prevent related non-storm water discharges. Non-storm water discharges resulting from washing and cleaning and dust suppression activities do not qualify as authorized non-storm water discharges in Section IV.A. of the Permit without implementation of BMPs and if in violation of a Regional permit. Notably, the San Diego Regional Municipal Separate Storm Sewer System (MS4) Permit Section E.2.a. prohibits the discharge of unauthorized non-storm water as an illicit discharge. Wash water is not listed among the authorized non-storm water discharges. (MS4 Permit, Section E.2.a.(3),(4)).

These discharge violations are ongoing and will continue until the Hanson Aggregates Owners and/or Operators develop and implement BMPs that prevent prohibited non-storm water discharges or obtain separate NPDES permit coverage. Each time the Hanson Aggregates Owners and/or Operators discharge prohibited non-storm water in violation of Discharge Prohibition III.B. of the Permit is a separate and distinct violation of the Storm Water Permit and section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). CERF will update the number and dates of violations when additional information becomes available. The Hanson Aggregates Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since January 18, 2014.

III. Remedies

Upon expiration of the 60-day period, CERF and Coastkeeper will file a citizen suit under Section 505(a) of the Clean Water Act for the above-referenced violations. During the 60-day notice period, however, CERF and Coastkeeper are willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of litigation, it is suggested that you initiate those discussions immediately. If good faith negotiations are not being made, at the close of the 60-day notice period, CERF and Coastkeeper will move forward expeditiously with litigation.

Hanson Aggregates must develop and implement an updated SWPPP, install BMPs to address the numerous and ongoing water quality violations, and implement a robust monitoring and reporting plan. Should the Hanson Aggregates Owners and/or Operators fail to do so, CERF and Coastkeeper will file an action against Hanson Aggregates for its prior, current, and anticipated violations of the Clean Water Act. CERF and Coastkeeper's action will seek all remedies available under the Clean Water Act § 1365(a)(d). CERF and Coastkeeper will seek the maximum penalty available under the law which is \$37,500 per day for violations prior to November 2, 2015, and \$51,570 per day for violations occurring after November 2, 2015. (33 U.S.C. § 1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1). CERF and Coastkeeper may further seek a court order to prevent Hanson Aggregates from discharging pollutants.

Lastly, section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorneys' and experts' fees. CERF and Coastkeeper will seek to recover all of their costs and fees pursuant to section 505(d).

IV. Conclusion

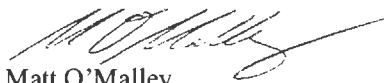
CERF and Coastkeeper have retained legal counsel to represent it in this matter. Please direct all communications to CERF and Coastkeeper's legal counsel:

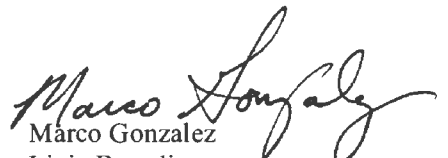
Livia Borak Beaudin and Marco Gonzalez
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1140 South Coast Highway 101
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San Diego Coastkeeper
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If you wish to pursue settlement discussions in the absence of litigation, please contact Coast Law Group LLP and San Diego Coastkeeper immediately.

Sincerely,


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Patrick McDonough
Attorneys for San Diego Coastkeeper


Marco Gonzalez
Livia Beaudin
Attorneys for Coastal Environmental
Rights Foundation

SERVICE LIST

VIA U.S. MAIL

Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Eileen Sobeck
Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0110

Mike Stoker
Regional Administrator
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105

David W. Gibson
Executive Officer
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, California 92108

Exhibit A - Precipitation Data

STATION	NAME	LATITUDE	LONGITUDE	ELEVATION	DATE	PRCP
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/11/2013	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/26/2013	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/9/2013	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/28/2013	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/29/2013	0.16
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/16/2013	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/21/2013	0.97
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/22/2013	0.49
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/29/2013	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/3/2013	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/5/2013	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/7/2013	0.1
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/19/2013	0.34
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/30/2014	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/3/2014	0.09
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/6/2014	0.2
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/7/2014	0.06
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/27/2014	0.14
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/28/2014	0.51
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/1/2014	1.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/2/2014	0.24
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/26/2014	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/27/2014	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/1/2014	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/2/2014	0.22
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/5/2014	0.09
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/25/2014	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/26/2014	0.16
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	8/2/2014	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	8/20/2014	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/1/2014	0.25
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/2/2014	0.08
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/20/2014	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/21/2014	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/2/2014	0.42
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/3/2014	0.27
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/12/2014	1.05
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/17/2014	0.41
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/30/2014	0.06
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/31/2014	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/11/2015	0.2
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/12/2015	0.17
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/26/2015	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/31/2015	0.01

Exhibit A - Precipitation Data

USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/22/2015	0.14
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/23/2015	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/28/2015	0.1
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/2/2015	0.25
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/25/2015	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/7/2015	0.05
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/14/2015	1.63
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/21/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/22/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/23/2015	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	6/30/2015	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/1/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/18/2015	1.03
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/21/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	8/25/2015	0.01
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/16/2015	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/4/2015	0.14
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/5/2015	0.27
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/18/2015	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/3/2015	1.09
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/4/2015	0.03
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/10/2015	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/15/2015	0.08
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/25/2015	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/26/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/27/2015	0.18
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/19/2015	0.11
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/21/2015	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/22/2015	0.17
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/23/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/24/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/25/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/28/2015	0.19
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/4/2016	0.14
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/5/2016	1.65
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/8/2016	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/15/2016	0.04

Exhibit A - Precipitation Data

USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/18/2016	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/30/2016	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/31/2016	0.14
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/18/2016	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/5/2016	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/6/2016	0.1
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/8/2016	0.06
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/9/2016	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/10/2016	0.17
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/5/2016	0.09
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/6/2016	0.34
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/30/2016	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/19/2016	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/20/2016	0.15
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/21/2016	0.16
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/24/2016	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/30/2016	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/20/2016	0.11
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/21/2016	0.12
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/26/2016	0.11
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/27/2016	0.17
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/28/2016	0.1
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/15/2016	0.12
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/16/2016	1.2
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/23/2016	0.01
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/31/2016	0.68
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/5/2017	0.16
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/11/2017	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/12/2017	0.32
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/13/2017	0.35
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/19/2017	0.19
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/20/2017	1.11
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/21/2017	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/22/2017	0.35
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/23/2017	0.22
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/24/2017	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/6/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/7/2017	0.11

Exhibit A - Precipitation Data

USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/11/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/17/2017	1.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/18/2017	0.08
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/19/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/26/2017	0.06
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/27/2017	2.34
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/5/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/22/2017	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/17/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/6/2017	0.1
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/7/2017	0.79
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/10/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/15/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	6/11/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/3/2017	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/8/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/9/2017	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/27/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/20/2017	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/8/2018	0.16
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/25/2018	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/22/2018	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/27/2018	0.32
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/4/2018	0.01
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/14/2018	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/15/2018	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/17/2018	0.27
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/19/2018	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/30/2018	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/1/2018	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/2/2018	0.08
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/12/2018	0.01